

JMK:AS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

15 N 714

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

PRISCI MERCADO SOTO,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

Andrea Nurko, being duly sworn, deposes and states that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

On or about July 30, 2015, within the Eastern District of New York and elsewhere, the defendant PRISCI MERCADO SOTO did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent’s information and belief are as follows:<sup>1</sup>

1. On or about July 30, 2015, the defendant PRISCI MERCADO SOTO, a citizen of the United States, arrived at John F. Kennedy International Airport (“JFK”) in

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<sup>1</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

Queens, New York aboard Delta Airlines Flight 500 from Santo Domingo, Dominican Republic.

2. The defendant was selected for a Customs and Border Protection (“CBP”) examination. The defendant presented two bags, a black “Swiss” backpack and a brown “Collection” carry-on bag.

3. A search of the black Swiss backpack revealed unusually thick panels. A CBP Officer examined one of the panels, revealing a package wrapped with foam, tape, and plastic. A probe of the package further revealed a white powdery substance, which field-tested positive for the presence of cocaine.

5. The total approximate gross weight of the cocaine recovered was 2,432.8 grams.

6. After he was placed under arrest, the defendant was read his Miranda rights, which he stated he understood and voluntarily waived. The defendant stated in sum

and substance and in part that he was transporting cocaine in his bag, and that he was supposed to be paid \$10,000 after he delivered the drugs.

WHEREFORE, your deponent respectfully requests that the defendant PRISCI MERCADO SOTO be dealt with according to law.

Dated: Brooklyn, New York  
July 31, 2015



ANDREA NURKO  
Special Agent  
United States Department of Homeland Security  
Homeland Security Investigations

Sworn to before me this  
31st day of June, 2015



THE HONORABLE VEKA M. SCANLON  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK